

Steve W. Berman (*pro hac vice*)  
 steve@hbsslaw.com  
**HAGENS BERMAN SOBOL SHAPIRO  
 LLP**  
 1301 Second Ave., Suite 2000  
 Seattle, WA 98101  
 Telephone: (206) 623-7292

Eamon P. Kelly (*pro hac vice*)  
 ekelly@sperling-law.com  
**SPERLING & SLATER P.C.**  
 55 W. Monroe, Suite 3200  
 Chicago, IL 60603  
 Telephone: (312) 641-3200

*Co-Lead Counsel for the Proposed Class in  
 In re Google Play Developer Antitrust  
 Litigation and Attorneys for Pure Sweat  
 Basketball, Inc.*

Bonny E. Sweeney (SBN 176174)  
 bsweeney@hausfeld.com  
**HAUSFELD LLP**  
 600 Montgomery Street, Suite 3200  
 San Francisco, CA 94104  
 Telephone: (415) 633-1908

*Co-Lead Counsel for the Proposed Class in  
 In re Google Play Developer Antitrust  
 Litigation and Attorneys for Peekya App  
 Services, Inc.*

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**IN RE GOOGLE PLAY STORE  
 ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

*In re Google Play Developer Antitrust  
 Litigation, Case No. 3:20-cv-05792-JD*

Glenn D. Pomerantz (SBN 112503)  
 glenn.pomerantz@mto.com  
**MUNGER, TOLLES & OLSON LLP**  
 350 South Grand Avenue, Fiftieth Floor  
 Los Angeles, California 90071  
 Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)  
 brian.rocca@morganlewis.com  
**MORGAN, LEWIS & BOCKIUS LLP**  
 One Market, Spear Street Tower  
 San Francisco, CA 94105-1596  
 Telephone: (415) 442-1000

Daniel M. Petrocelli, Bar No. 97802  
 dpetrocelli@omm.com  
**O'MELVENY & MYERS LLP**  
 1999 Avenue of the Stars, 7th Fl.  
 Los Angeles, CA 90067-6035  
 Telephone: (310) 553-6700

*Counsel for Defendants Google LLC et al.*

Case No. 3:21-md-02981-JD

**STIPULATION AND [PROPOSED]  
 ORDER RE DEVELOPER PLAINTIFFS'  
 CLASS CERTIFICATION DEADLINES  
 IN LIGHT OF SETTLEMENT**

[Civil L.R. 6-2]

Judge: Hon. James Donato

1 Pursuant to Civil Local Rule 6-2, the plaintiffs in the *In re Google Play Developer*  
2 *Antitrust Litigation*, No. 3:20-cv-5792-JD (N.D. Cal.) (“Developer Plaintiffs”); and the  
3 defendants Google LLC, Google Ireland Limited, Google Commerce Limited, Google Asia  
4 Pacific Pte. Limited, and Google Payment Corp. (collectively, “Google”), stipulate as follows:

5 WHEREAS, the current case schedule, ECF No. 191, 198, *In re Google Play Store*  
6 *Antitrust Litigation*, 3:21-md-02981-JD, requires Developer Plaintiffs to file a class certification  
7 motion on May 26, 2022, with additional class certification filing deadlines to follow for  
8 Developer Plaintiffs and Google in connection with that motion.

9 WHEREAS, the current case schedule requires Google and Developer Plaintiffs to file  
10 *Daubert* motions in connection with the other party’s class certification expert reports on May  
11 26, 2022, with additional filing deadlines to follow for both parties in connection with such  
12 motions.

13 WHEREAS, Developer Plaintiffs and Google have agreed to the principal terms on  
14 which the parties will settle *In re Google Play Developer Antitrust Litigation*, No. 3:20-cv-5792-  
15 JD (N.D. Cal.), subject to Court approval, on behalf of a class of U.S. Developers that sold paid  
16 apps or in-app content through the Google Play store and had up to \$2 million in annual sales  
17 through the Google Play store during each year of the 2016-2021 period. Developers Plaintiffs  
18 and Google estimate that the proposed settlement class represents more than 99 percent of all  
19 U.S. developers selling paid apps or in-app content through the Google Play store.

20 WHEREAS, Developer Plaintiffs and Google are working expeditiously and in good  
21 faith to finalize the long-form settlement agreement, and anticipate that any motion for  
22 preliminary approval of the settlement will be filed on or before June 16, 2022.

23 WHEREAS, in furtherance of the settlement, and to conserve judicial and party  
24 resources, the Developer Plaintiffs and Google agree, and request that the Court order, that the  
25

1 class certification and *Daubert* deadlines as between the Developer Plaintiffs and Google should  
2 be held in abeyance pending further order of the Court, with the parties agreeing to reserve all  
3 rights related to class certification.

4 NOW, THEREFORE, IT IS STIPULATED AND AGREED, SUBJECT TO THE  
5 APPROVAL OF THE COURT:

6 1. All class certification deadlines and deadlines for *Daubert* motions for class  
7 certification experts as between Developer Plaintiffs and Google, in Case No. 3:20-cv-05792-JD,  
8 shall be held in abeyance pending further order of the Court.

9 2. Developer Plaintiffs shall file a motion for preliminary approval of the settlement  
10 as soon as is practicable, but on or before June 16, 2022.

11 Dated: May 25, 2022

12 HAGENS BERMAN SOBOL SHAPIRO LLP  
13 Steve W. Berman  
14 Robert F. Lopez  
15 Ben M. Harrington  
16 Benjamin J. Siegel

17 SPERLING & SLATER, PC  
18 Joseph M. Vanek  
19 Eamon P. Kelly  
20 Alberto Rodriguez

21 Respectfully submitted,

22 By: /s/ Steve W. Berman  
23 Steve W. Berman

24 *Co-Lead Interim Class Counsel for the*  
25 *Developer Class and Attorneys for Plaintiffs*  
*Pure Sweat Basketball and LittleHoots, LLC*

HAUSFELD LLP

Bonny E. Sweeney  
Melinda R. Coolidge  
Katie R. Beran  
Scott A. Martin  
Irving Scher

Respectfully submitted,

By: /s/ Bonny E. Sweeney

Bonny E. Sweeney

*Co-Lead Interim Class Counsel for the  
Developer Class and Attorneys for Plaintiffs  
Peekya App Services, Inc. and Scalisco LLC*

MORGAN, LEWIS & BOCKIUS LLP

Brian C. Rocca  
Sujal J. Shah  
Michelle Park Chiu  
Minna L. Naranjo  
Rishi P. Satia

Respectfully submitted,

By: /s/ Brian C. Rocca

Brian C. Rocca

*Counsel for Defendants Google LLC et al.*

O'MELVENY & MYERS LLP

Daniel M. Petrocelli  
Ian Simmons  
Benjamin G. Bradshaw  
Stephen J. McIntyre

Respectfully submitted,

By: /s/ Ian Simmons

Ian Simmons

*Counsel for Defendants Google LLC et al.*

MUNGER, TOLLES & OLSON LLP

Glenn D. Pomerantz

Kyle W. Mach

Kuruvilla Olasa

Justin P. Raphael

Emily C. Curran-Huberty

Jonathan I. Kravis

Respectfully submitted,

By: /s/ Glenn D. Pomerantz

Glenn D. Pomerantz

*Counsel for Defendants Google LLC et al.*

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**E-FILING ATTESTATION**

I, Steve W. Berman, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

s/ Steve W. Berman  
STEVE W. BERMAN